

**IN UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE AIR CRASH INTO THE JAVA SEA ON
JANUARY 9, 2021

This document relates to the following cases:

DEWI WAHYUNI, individually; as Personal Representative of the Estate of YOHANES, and as next of friend of his minor child D.M.A.,

Plaintiff,

v.

THE BOEING COMPANY, a Delaware corporation,

Defendant

HALIMAH ARIFNI, individually; as Personal Representative of the Estate of ASY HABUL YAMIN, and as next of friend of his minor children N.I.M., H.D.H., T.R.Y., and M.A.S.,

Plaintiff,

v.

THE BOEING COMPANY, a Delaware corporation,

Defendant.

MASRIZAL, individually and as personal representative of the estate of FAISAL RAHMAN,

Plaintiff,

v.

THE BOEING COMPANY, a corporation,

Defendant.

Lead Case No.:
1:23-md-3072-CMH-WEF

Member Case Nos.:
1:23-cv-00475
1:23-cv-00482
1:23-cv-00483
1:23-cv-00555

NELI HANDAYANI, individually; as Personal Representative of the Estate of PIPIT PIYONO; and as next friend of his minor child A.M.T.,

Plaintiff,

v.

THE BOEING COMPANY, a Delaware corporation,

Defendant.

DECLARATION OF SANJIV N. SINGH IN SUPPORT OF THE JOINT MOTION FOR APPROVAL OF SETTLEMENTS AND TO DISMISS FOR DECEDENT FAISAL RAHMAN

I, SANJIV N. SINGH, do hereby DECLARE as follows:

BACKGROUND

1. I am lead counsel of record for the above captioned plaintiffs. I am licensed to practice in the State of California and have been admitted *pro hac vice* in this case.
2. This declaration is made in support of the Joint Motion for Dismissal of Plaintiffs' Claims with Prejudice and Approval of Minor Settlements.
3. I have had extensive experience in representing members of families surviving victims of fatal accidents and catastrophic personal injury, including numerous minors. I believe the settlement amounts listed below are fair and reasonable for all plaintiffs in this family, which has no minor plaintiffs. Specifically, I have extensive experience litigating claims of Indonesian air crash victims against Boeing, having represented and settled claims for 16 families as lead counsel in the Boeing 737-MAX Lion Air Flight JT 610 crash. *See In Re Lion Air Flight JT610 Crash*, 1:18-cv-07686 (N.D. Ill. 2018).
4. Decedent FAISAL RAHMAN was 30 years old when he died in this crash. At the time of his death, Decedent RAHMAN was a Muslim, a citizen of Republic of Indonesia, and a resident of Sintang, West Kalimantan, Indonesia. At the time of his death, he was the co-owner and officer of his family's retail and wholesale clothing business located in West Kalimantan, Indonesia, as well as a social media artist, and was traveling from Jakarta,

Indonesia, to Pontianak, West Kalimantan, Indonesia as a passenger of Sriwijaya Air Flight SJ 182 that crashed into Java Sea, Indonesia, on January 9, 2021. At the time of his death, Decedent FAISAL RAHMAN was not married and did not have children.

5. He is survived by the following heirs:
 - a. Biological Father MASRIZAL, age 71 years old; he is a Muslim, a citizen of Republic of Indonesia and a resident of Sintang, West Kalimantan, Indonesia.
 - b. Biological Mother MARYATI, age 69 years old; she is a Muslim, a citizen of Republic of Indonesia and a resident of Sintang, West Kalimantan, Indonesia.

MEDIATION PROCESS

6. Counsel for this Plaintiff and counsel for Defendant engaged in an all-day mediation on July 12, 2024, before the retired Eastern District of Virginia Judge Gerald Bruce Lee, and have reached an agreement to settle the claims of the Plaintiffs against Boeing.
7. As a condition of the settlement, Plaintiffs have agreed to keep the amount of the settlement confidential.
8. In negotiating this settlement, I considered the strength of Plaintiffs' action against Boeing and Boeing's defenses. It is my opinion as Plaintiffs' lead trial counsel that the settlement amount is fair and reasonable under all the above-stated considerations.
9. Based on my review of his credentials and his performance at the mediation, it is my opinion as lead trial counsel that Judge Lee has a great deal of experience as a judge in wrongful death matters and it is my understanding at the conclusion of the mediation that Judge Lee also believes this is a reasonable settlement.
10. My team, specifically Michael B. Indrajana, has fully explained all the above facts to the Sriwijaya Air Flight SJ182 Plaintiffs, and Plaintiffs agree that the settlement amount is fair and reasonable.

SETTLEMENT

11. This settlement resolves all claims of all Plaintiffs against all potentially liable parties.
12. Settlement for all Plaintiffs is in the gross amount of \$[REDACTED]. The settlement funds are to be disbursed as follows:

| | |
|---------------------------------------|--------------|
| a. MASRIZAL (Biological father) (1/2) | \$[REDACTED] |
| b. MARYATI (Biological mother) (1/2) | \$[REDACTED] |

13. Attorneys' Fees are 30% of the total settlement, which is \$[REDACTED].

14. Costs for this case is estimated at \$5,482.96, which reflects all costs incurred and/or billed in the case thus far.

15. Thus, the net recovery for each beneficiary in this matter is as follows:

| | |
|---------------------------------------|--------------|
| a. MASRIZAL (Biological father) (1/2) | \$[REDACTED] |
| b. MARYATI (Biological mother) (1/2) | \$[REDACTED] |

16. Mack Shultz, counsel for The Boeing Company, was informed of this and stated Boeing would not be taking a position on this issue. Boeing vis-à-vis Mr. Shultz took the same position on this issue in the Lion Air civil settlements before the Northern District of Illinois. *See In Re Lion Air Flight JT 610 Crash* at Dkt. No. 707 at ¶ 10.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge or belief based on reliable information.

DATED this 18th day of October 2024, at San Mateo, California.

/s/ Sanjiv N. Singh
SANJIV N. SINGH (CA BAR 193525)
Attorney for Plaintiffs NELI HANDAYANI,
DEWI WAHYUNI, HALIMAH ARIFNI, and
MASRIZAL